

**AMENDMENTS TO THE DRAWINGS**

Please substitute the enclosed sheet 2/2, labeled "Replacement Sheet," for the corresponding sheets presently in the case.

In response to an objection, Fig. 4 is amended to correct a lead line for vertical rib 34.

In view of the amendment, it is requested that the objection be withdrawn and that the drawings be accepted.

## REMARKS

The specification is amended to provide a U.S. patent number corresponding to the originally recited European patent publication. As noted by the Examiner, the European patent application, although discussed, was inadvertently omitted from the listing of references in Applicants' Information Disclosure Statement. However, the Examiner has cited the U.S. patent to Coha et al.

Page 7 is amended to delete reference to the claim, consistent with customary United States practice. A reference numeral in the Abstract has been corrected.

### *Objection to Specification*

In response to an objection, a reference to claim 1 has been deleted from the specification. Also in response to an objection, a reference numeral in the abstract has been corrected.

Accordingly, it is requested that the objections be withdrawn.

### *Objections to Claims*

In response to an objection, claim 2 is amended to point out that the S-shape is in a horizontal plane, as seen in Fig. 4. To clarify, the "S" is seen in the horizontal plane, not the vertical plane. A reference numeral in claim 7 is corrected.

Also, in response to objections regarding dependencies, the dependent claims are amended to numerically identify the claim upon which each claim depends, and to

eliminate multiple dependencies. Following these amendments, it is believed that proper antecedents are provided for the ribs in claim 5.

In view of the amendment, it is requested that the objections be withdrawn.

*Claim Rejection based upon Coha et al. and Sundstrom*

Claims 1-3 were rejected under 35 U.S.C. § 103 as unpatentable over United States Patent No. 5,482,444, issued to Coha et al. in 1996, in view of United States Patent No. 5,764,498, issued to Sundstrom in 1998.

The U.S. patent to Coha et al. corresponds to the European patent publication discussed in the Background of the Invention beginning at page 1, line 7. Coha et al. discloses elastic tubes 74A-C to isolate fuel pump 48 from reservoir 30, see Fig. 2 and 4 and col. 3, beginning at line 60. Whereas the tubular elements rely mainly on the elasticity of the rubber material, the present invention provides an S-geometry to enhance dampening, see page 2, lines 8-12. As a result, S-shaped elements may be formed of semi-rigid plastic material, while providing suitable dampening, thereby simplifying mounting and reducing cost, page 3, lines 28-29. Coha et al. does not teach or suggest using S-shaped elements to dampen fuel pump vibration, and so does not show Applicants' invention.

The rejection looks to Sundstrom to make up the deficiency. Referring to Fig. 1, Sundstrom discloses a microelectronic assembly that includes an electronics subassembly

4 supported on a printed wiring board (PWB) 6 by couplings 8, col. 2, lines 44-46. The rejection points to the S-shape of the couplings, the main function of which includes to provide electrical connections, col. 1, lines 23-26. It is one thing to mount an electronic component, and a totally different challenge to isolate vibrations of a fuel pump. One reason is that the electronic components in Sundstrom do not have moving parts. For another thing, the couplings in Sundstrom are formed of metal, col. 2, lines 50-51, in contrast to plastic material. Still further, the components are planar, in contrast to the curved surfaces in Applicants' fuel pump. There is nothing in Coha et al. to point to use of electronic couplings to isolate a fuel pump, and nothing in Sundstrom to point to use of the metal coupling to buffer plastic components in a fuel pump. Thus, the references themselves do not provide motivation to combine them. Moreover, the practitioner, aware of the substantial differences in size, structure and operation of an electronic assembly and a fuel pump assembly, is not lead to use electronic components to support a fuel pump in a reservoir. Without this, the references cannot be fairly combined to show Applicants' invention.

Claim 1 is directed to Applicants' fuel pump assembly that includes an inner retainer and a fuel pump. In accordance with the claim, the inner retainer has legs connected to a retainer body by a resilient connecting element having a generally S-shape profile. Coha et al. provides a tubular element and does not suggest the improvement provided by an S-shape element. Nothing in Sundstrom leads the practitioner to use the metal electrical coupling to isolate a fuel pump. Thus, when fairly read, the references do

not point the practitioner to Applicants' fuel pump assembly in claim 1.

Claims 2-3 are dependent upon claim 1 and so not suggested by the references at least for the reasons set forth with regard to that claim.

Accordingly, it is respectfully requested that the rejection of the claims based upon Coha et al. and Sundstrom be reconsidered and withdrawn, and that the claims be allowed.

*Claim Rejection based upon Coha et al., Sundstrom and Weber*

Claim 4 was rejected under 35 U.S.C. § 103 as unpatentable over Coha et al. and Sundstrom, further in view of United States Patent No. 4,752,058, issued to Weber in 1988.

Claim 4 is dependent upon claim 1. For the reasons above, the practitioner is not lead to use the electrical components in Sundstrom in the fuel pump of Coha et al., and so the primary references do not point to Applicants' fuel pump assembly in claim 1. It follows that they also do not lead to claim 4.

Weber is applied to show ribs 45 in a spring rail. However, Weber is directed to springs to support relatively large, heavy items for transport in trucks, railroad cars and the like, col. 1, lines 8-13, in dramatic size contrast to the electronic assembly in Sundstrom. Like Sundstrom, though, Weber provides support between planar surfaces,

see Fig. 3. Further, Weber provides two different spring rates with a view toward absorbing a sudden heavier shock, col. 4, lines 4-12. Nothing in Weber contemplates springs for use to isolate a fuel pump within a reservoir. It is only with the benefit of hindsight, following disclosure of Applicants' invention, that the rejection is able to choose features of a shock absorbing rail supporting a load in a truck, per Weber, and a metal coupling in a microelectronic assembly, per Sundstrom, and substitute the result for the tubular elements within the fuel pump of Coha et al. The references themselves do not lead the practitioner to their combination, and so cannot render obvious Applicants' fuel pump assembly with S-shaped resilient elements connecting a flexible leg to a retainer body as set forth in claim 1, and included in dependent claim 4.

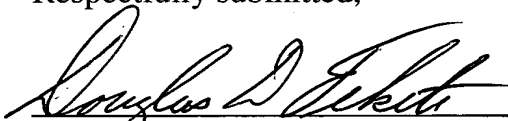
Therefore, it is respectfully requested that the rejection of the claims based upon Coha et al., Sundstrom and Weber be reconsidered and withdrawn, and that the claims be allowed.

*Conclusion*

It is believed, in view of the amendments and remarks herein, that all grounds of rejection of the claims have been addressed and overcome, and that all claims are in condition for allowance. If it would further prosecution of the application, the Examiner is urged to contact the undersigned at the phone number provided.

The Commissioner is hereby authorized to charge any fees associated with this communication to Deposit Account No. 50-0831.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Douglas D. Fekete", is written over a horizontal line.

Douglas D. Fekete

Reg. No. 29,065

Delphi Technologies, Inc.

Legal Staff – M/C 480-410-202

P.O. Box 5052

Troy, Michigan 48007-5052

(248) 813-1210